

EXHIBIT C

Subject
Furnishes

Declaration under penalty of perjury of
Charles Daley, 472644, being competent to make
this declaration and having personal knowledge of the
matters stated therein, declares pursuant to 28 U.S.C. § 1746.

1. I was James's next door neighbor at the time
of the incident. I heard him and his celly get
into another of their many arguments around
11:00 AM one morning. This argument was different
because James's celly started to threaten him
with violence. I did hear a fight begin
and after a few minutes the doors opened
for lunch. James's celly then came out of
the cell and started a bigger fight that
was muslim's verses non-muslim's. Guys
had mop handles and brooms. The police
eventually saw what was going on after
a good five minutes of fighting. They
took all muslims to the SHU and the
incident was over.

9-24-05

Declaration under penalty of perjury of
Ulyses S. Davis Jr, 00229889, being competent to make
this declaration and having personal knowledge of the matter
stated therein, declares pursuant to 28 U.S.C § 1746:

1. I became friendly with Mr. James Hall after playing a few games
of chess with him and leading up to the day he got into a fight
with his cell mate we talked about how his cell mate kept
trying to make Mr. Hall fight him and as we talked about what
he could do about the matter I said he should use the chaining
command to be moved out of the cell because his hand was hurt
and he did so, but they would not move him and in June he
got into a fight with his cell mate and his tooth was knocked out
and a few other guys tried to jump on him and his cell mate
punched another inmate in the face as well before his cell
mate was put in the SHU.

Ulyses S. Davis Jr

Declaration under penalty of perjury

#177704

Glen Smith, being compelled to make this Declaration
and having personal knowledge of the matters stated therein, declares
Pursuant to 28 U.S.C. § 1746

4.) On the day the fight happen Jimmy was angry & upset at his cellmate.
He stated that he was being given a lot of hassle & ~~problems~~ problems
at lunch time that day. Jimmy was attacked by his cellmate. I heard
the fight & witnessed the end and heard the cellmate say yea I got that
faggit.

Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury
that the foregoing is true and correct Executed on 9/30/05

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Declaration under penalty of perjury of James Hall,
 00167581, being competent to make this declaration and
 having personal knowledge of the matter stated herein, declares
 pursuant to 28 U.S.C. § 1746:

On 3-30-04 my cellie Anthony Coffield was
 Taunting me, and eventually physically assaulted me (by
 pointing his finger into my forehead in a aggressive manner
 in anger inmate Coffield was intimidating me trying
 to get me to fight him. Once he even spit in my face
 The door open and I went straight to the tier
 officer, in compliance with the rule (The chain of command).
 Affiant was directed by C/O Wilson to go talk to
 (MHU) Sgt Sullivan and asked to be moved because of
 the confrontation that just occurred Affiant was told
 by Sgt Sullivan "It's a life or death, not keeping it real
 you have to fight or sign on. ID. commitment Exhibit

DECLARATION under penalty of perjury of
 James Hall, 00167551, Being competent to make this
 declaration and having personal knowledge of the matters
 stated therein, declares pursuant To 28 U.S.C. § 1746.

Affiant Asserts the following:

On 6-6-04 I was viciously attacked by Anthony Coffield and
 other members of a collective group (i.e. Muslims) After the attack
 Affiant and another Inmate was escorted out of (MTH) B-Tier into a
 Corridor where Affiant was questioned by Lt. Boon in regards to the incident
 that just taken place. Affiant confronted Lt. Boon about matters forwarded
 to him from Clyde D. Sayers in regard to the previously well documented
 threats on Affiant person. [Lt. Boon stated, I needed ya'll to fight in order to
 move Affiant's Aggressor]. Moment before this Admission Affiant "In Discuss"
 explained to Lt. Boon that, I wrote Major Holman and ~~at~~ all ya'll telling
 ya'll that my cellie was threatening Bailey Gorman to me everyday and now
 I'm starting the bleeding and he knocked my damn tooth out and all
 his muslim boys jumped me and my friend help get them off me
 if ya'll would have moved me like I asked ya'll too none of
 this [choose words] would of happened. There was two
 other officer's present during this interview on officer's name I set
 Abernathy other officer Name Unknown at this time

James Hall

12-5-05



STATE OF DELAWARE
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OFFICE OF THE DEPUTY WARDEN
DELAWARE CORRECTIONAL CENTER
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SMYRNA, DELAWARE 19977
Telephone: (302) 653-9261
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Clyde D. Sagers

MEMORANDUM

TO: IM James Hall
SBI# 167581
MHU 23 BL10B

FROM: Clyde D. Sagers
Acting Deputy Warden I

DATE: May 17, 2004

RE: Letter

A handwritten signature in black ink, appearing to read "Capt. Sagers", with a large checkmark-like flourish at the end.

I have received your letter in reference to your cellmate. I have forwarded your letter to Lieutenant Boone for his investigation.

LAM/dc

Attachment

cc: Lt. Boone
Inmate File